

March 8, 2023

**Submitted via ECF**

Chief Judge Richard Seeborg  
San Francisco Courthouse  
Courtroom 3 - 17th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Re: Joint Letter Brief re: Notice Issues  
*Rodriguez v. Google LLC*, Case No. 3:20-cv-04688-RS (N.D. Cal.)

Dear Chief Judge Seeborg:

The parties have reached an agreement regarding the remaining notice-related dispute. The parties appreciate the Court's patience. The remaining dispute concerned access to information Google has regarding potential class members, who will receive direct notice by email.

To resolve this dispute, the parties agreed to the following:

- The Class Notice Administrator (Epiq) shall be responsible for providing direct notice to potential class members by email using information provided by Google designated by Google as Highly Confidential - Attorneys' Eyes Only under the Protective Order.
- In connection with this notice process, Class Counsel may seek information from Epiq, and Epiq may share information with Class Counsel. This includes, for example, Epiq and Class Counsel sharing information for the purpose of checking the membership of individual class members, performing due diligence on the formatting and construction of the list and providing notice, troubleshooting issues, and other similar activities. Such information will be stored and secured by Epiq, using commercially reasonable and appropriate standards.
- Epiq will be entitled to share information, including information pertaining to individual class members, with class counsel but only subject to appropriate steps to maintain the security of that data (such as remote access to Class Counsel without transferring the table). Class Counsel may seek access to this information, for example, in the event they receive inquiries from potential class members. The information will remain stored and secured by Epiq, and Class Counsel will not print or transfer copies of the list or portions of it (electronic or otherwise), outside of Epiq.

Respectfully,

WILLKIE FARR & GALLAGHER, LLP

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By: /s/ Eduardo E. Santacana

/s/ Mark C. Mao

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**ATTESTATION**

I, Eduardo Santacana, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: March 8, 2024	By: <u>/s/ Eduardo E. Santacana</u> Eduardo E. Santacana